

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CARMEN JOHN PERRI,

Plaintiff,

v.

MAYFLOWER PARK HOTEL, INC.,

Defendant.

No. 2:19-cv-00132-JLR

STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND DEADLINE FOR  
DEFENDANT TO RESPOND TO  
COMPLAINT IN RE: PERRI v. 621  
APARTMENTS, LLC

(RELATING TO No. 2:19-cv-00139-JLR)

NOTE ON MOTION CALENDAR:  
JUNE 20, 2019

CARMEN JOHN PERRI,

Plaintiff,

v.

425 QUEEN ANNE, LLC,

Defendant.

No. 2:19-cv-00137-JLR

STIPULATION AND [PROPOSED] ORDER TO EXTEND  
DEADLINE FOR DEFENDANT TO RESPOND TO COMPLAINT

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1 CARMEN JOHN PERRI,

2 Plaintiff,

3 v.

4 621 APARTMENTS, LLC,

5 Defendant.

No: 2:19-cv-00139-JLR

6 CARMEN JOHN PERRI,

7 Plaintiff,

8 v.

9 SORRENTO HOTEL PARTNERSHIP,

10 Defendant.

No: 2:19-cv-00144-JLR

11 CARMEN JOHN PERRI,

12 Plaintiff,

13 v.

14 2301 THIRD AVENUE, LP,

15 Defendant.

No: 2:19-cv-00297-JLR

16  
17 Plaintiff Carmen John Perri ("Plaintiff") and defendant 621 Apartments, LLC  
18 ("Defendant"), by and through their undersigned counsel, hereby stipulate to an extension of  
19 the time for Defendant to answer or otherwise respond to the Complaint [Dkt. No. 1, Case No.  
20 C19-0139JLR] to July 19, 2019, to further facilitate the prospect of settlement discussions.

21 The Parties hereby submit that good cause exists for extension of the time for Defendant  
22 to answer or otherwise respond to the Complaint, as follows.

- 23 1. Plaintiff filed the Complaint on January 30, 2019.  
24 2. Defendant received the Summons and Complaint in early February, 2019.  
25

3. Defendant's counsel was first retained in this matter on April 18, 2019, and filed a Notice of Appearance on April 19, 2019.

4. The parties remain actively engaged in settlement discussions and request that the deadline for Defendant to respond to the Complaint be extended to July 21, 2019, to facilitate such discussions by allowing more time before Defendant undertakes the expense of preparing a response to the Complaint.

DATED this 20th day of June, 2019.

s/ Todd T. Williams

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*s/ Dan N. Fiorito*


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*Attorney for Plaintiff Carmen John Perri*

**ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED.

DATED this 25<sup>th</sup> day of June, 2019.

  
HONORABLE JAMES L. ROBART  
United States District Judge

Presented by:

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s/ Todd T. Williams

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